

Patrick Selvey

From: Nicholas Goodman
Sent: Friday, February 10, 2023 12:25 PM
To: Ahmad Keshavarz; Patrick Selvey
Cc: Emma Catherine
Subject: RE: Francois v. Victory, et al 1:22-cv-4447 - Letter regarding mediation

Counselor,

Your client is in no position to accept or reject Defendants' settlement offer made February 3, 2023, which offer expired by its terms automatically at close of business February 6.

Further, as we previously advised you in no uncertain terms, we will not undertake mediation in the absence of a settlement demand. We also flatly rejected mediation before Mr. DiBenedetto. Our position on both those points has not changed, particularly given your continued failure to present even a hint at good faith negotiation.

Indeed, your invocation of the concept of "frank discussion" is frankly absurd given your refusal even to state a counter to Defendants' offer. It is now more clear than ever that you are not interested in a resolution to benefit your client but are rather intent only on harassing my clients by, among other things, continuing to pursue frivolous damage claims and further multiplying these already tortured proceedings.

Finally, only the Court can alter the motion briefing schedule and Mr. Larson advised there would be no further adjournments.

We made a serious attempt to negotiate with you. You did not respond in kind. We are therefore proceeding with our summary judgment motion. Should Ms. Francois wish to discuss settlement directly with my clients without the participation of attorneys on either side please let me know and I will seek to arrange for same.

Please be guided accordingly.

H. Nicholas Goodman

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Thank you.

From: Ahmad Keshavarz <ahmad@newyorkconsumerattorney.com>

Sent: Thursday, February 9, 2023 4:35 PM

To: Patrick Selvey <Pselvey@ngoodmanlaw.com>

Cc: Emma Catherine <emma@newyorkconsumerattorney.com>; Nicholas Goodman <Ngoodman@ngoodmanlaw.com>

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Please see attached.



FDCPA Attorneys: Protecting consumers from
deceptive and unfair debt collection

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